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June 9, 2008

Mr. Paul Hann
Environmental Scientist
Central Valley Water Quality Control Board (CVWQCB)
11020 Sun Center Drive
Rancho Cordova, CA 95670-6114

Re: **Syngenta Crop Protection Comments on the Active Ingredient Specific Data for Relative-Risk Evaluation for Pesticides Used in the CV Pesticide Basin Plan Amendment.**

Dear Mr. Hann:

On behalf of the Syngenta Crop Protection, Inc., I am providing you this letter that addresses the CVWQCB's Draft Document entitled Relative-Risk Evaluation for Pesticides Used in the Central Valley Pesticide Basin Plan Amendment Project Area issued April 2008. Syngenta welcomes the opportunity to comment on this public review draft document specifically in regards to values reported for Syngenta active ingredients.

As Syngenta understands, the purported goal of this relative-risk evaluation report for pesticides is to provide a screening level evaluation methodology for identifying and prioritizing a target list of current-use pesticides to help the CVWQCB determine priorities for further pesticide evaluation and development of water quality objectives. Regarding the goal of conducting further pesticide evaluation, Syngenta does NOT believe that the ranking process is necessary since the pesticides are all registered under FIFRA and have already been evaluated by simple and, where necessary, more sophisticated ecological and environmental risk assessment processes (and also for their human risk potential). Priorities for development of water quality objectives should be set by determining whether specific products are actually resulting in impairment of biological integrity by evaluation of multiple lines of evidence collected from specific water bodies.

To ensure that correct values for our active ingredients are used in any evaluation, we are providing updated information that corrects errors in the data associated with our active ingredients. We respectfully request they be incorporated into your Final Document. The table below provides the updated values and additional comments. We have cross-referenced them to the appropriate page in Appendix A but we request that Tables 2A, 2B and 3 be corrected also.

Active Ingredient	**Appendix A: page No.**	**Corrected Values and Comments**
(S)-metolachlor	A-2	The correct toxicity ranges are: 96-hour LC50 - 1,410 ug/L to **17,000 ug/L** EC50 – 8 ug/L to **21,000 ug/L**
Abamectin	A-4	The water solubility is **0.0078 mg/L** 96-hour LC50 is **0.21 ug/L** to 42 ug/L The highest EC50 value is 430 ug/L for the Eastern oyster.
Chlorothalonil	A-9	The water solubility is **0.81 mg/L**. 96-hour LC50 is 26 ug/L to **430 ug/L**. The lowest value represents an EC50 not an LC50 for the Eastern oyster. The Eastern oyster is a mollusk not a crustacean.
Lambda-cyhalothrin	A-26	The 96-hour LC50 is 0.0041 ug/L to > **590 ug/L**.
Paraquat dichloride	A-38	The mean Koc value is **1,636,000**. However, "Because paraquat dichloride dissipates by binding very strongly to clay minerals in soils, using models that depend on degradation parameters would yield inappropriate EEC predictions. Due to paraquat dichloride's strong adsorption to soil, no aquatic residues are expected as a result of runoff." (EPA Paraquat RED http://www.epa.gov/oppsrrd1/REDs/0262red.pdf)
Simazine	A-50	The water solubility is **3.5 mg/L** and Average Koc is **122**.
Norflurazon	A-73	The 96-hour LC50 is **5,530 ug/L** to 16,300 ug/L. (The value of 3,800 ug/L is an EC50 for the Eastern oyster not an LC50.)

If there are questions associated with this action, please feel free to contact me at 800-334-9481 ext. 2449 or debbie.stubbs@syngenta.com.

Sincerely,

Debbie Stubbs
Senior Regulatory Manager

cc. Paul Hendley, Syngenta Crop Protection
Nasser Dean, Western Plant Health Association